

FILED ENTERED  
LODGED RECEIVED  
JUL 27 2016  
AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY  
BY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES JOSEPH CONLIN,

Defendant.

NO. **CR16-213 RSL**

FELONY INFORMATION

The United States Attorney charges that:

**COUNT 1**  
***(Wire Fraud)***

**A. The Scheme and Artifice to Defraud.**

1. Beginning at a date uncertain, but no later than May 2008, and continuing until on or about April 2013, in King County, within the Western District of Washington, and elsewhere, JAMES JOSEPH CONLIN devised a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

2. The object of the scheme and artifice to defraud was for JAMES JOSEPH CONLIN unlawfully to obtain money and funds, in the form of real estate proceeds, from R.M. by unilaterally facilitating and orchestrating the unauthorized sale of real property

1 belonging to R.M., without R.M.'s knowledge or consent, for the sole purpose of using  
2 said proceeds for his own personal and business expenses. In so doing, JAMES JOSEPH  
3 CONLIN misrepresented to buyers that he was acting on the victim's behalf.

4 **B. Manner and Means of the Scheme to Defraud.**

5 3. It was a part of the scheme and artifice that JAMES JOSEPH CONLIN  
6 obtained power of attorney from R.M.

7 4. It was further part of the scheme and artifice to defraud that JAMES  
8 JOSPEH CONLIN concealed from R.M. the fact that he had been disbarred in 2010 from  
9 practicing law in the State of Washington.

10 5. It was further part of the scheme and artifice to defraud that JAMES  
11 JOSEPH CONLIN executed the sale of two properties, one on August 3, 2009 and the  
12 other on December 15, 2011, for total value of approximately \$379,500, and used the sale  
13 proceeds, totaling approximately \$70,000.00, for personal expenses.

14 6. It was further part of the scheme and artifice to defraud that on or about  
15 November 18, 2011, JAMES JOSEPH CONLIN forged the signature on a Quit Claim  
16 Deed for the property located at 3216 South 208<sup>th</sup> Street, SeaTac, Washington.

17 7. It was further part of the scheme and artifice to defraud that on or about  
18 November 18, 2011, JAMES JOSEPH CONLIN forged the notary seal on the Quit Claim  
19 Deed for the property located at 3216 S 208<sup>th</sup> Street, SeaTac, Washington.

20 8. It was further part of the scheme and artifice to defraud that in or around  
21 April 2013, JAMES JOSEPH CONLIN forged the signatures and notary on Special  
22 Warranty Deed and the signature on Statutory Warranty Deed for the property located at  
23 846 South Donovan Street, Seattle, Washington.

24 **C. Execution of the Scheme and Artifice to Defraud**

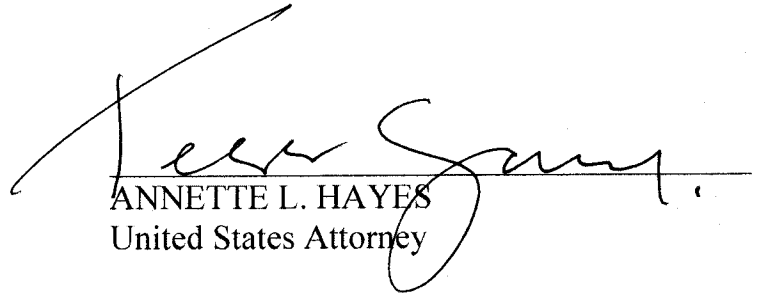
25 9. On or about the below listed date, in King County, within the Western  
26 District of Washington, and elsewhere, JAMES JOSEPH CONLIN, having devised the  
27 above-described scheme and artifice, and for the purpose of executing this scheme and  
28 artifice, did knowingly transmit and cause to be transmitted, in interstate commerce by

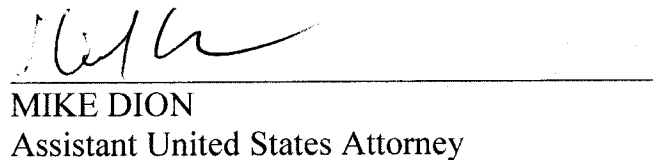
means of a wire communication, certain writings, signs, signals, pictures, and sounds, to wit:

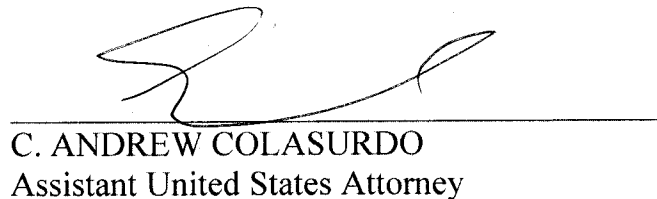
Count	Date	Interstate Wire & Content
1	December 20, 2011	Electronic wire containing instructions to transfer \$44,012.59 in proceeds from the unauthorized sale of R.M.'s property to Defendant's bank account, from Pinnacle Escrow located in Bellevue, Washington, to Banner Bank, after which the wire was routed through Fedwire servers located in Dallas, Texas and East Rutherford, New Jersey.

All in violation of Title 18, United States Code, Sections 1343.

Dated this 26<sup>th</sup> day of July, 2016.

  
ANNETTE L. HAYES  
United States Attorney

  
MIKE DION  
Assistant United States Attorney

  
C. ANDREW COLASURDO  
Assistant United States Attorney